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November 14, 2017

BY ECF:

The Honorable Andrew L. Carter
United States District Judge

Re: *Brown et al., v. The City of New York, et al.*, 16 CV 1919 (ALC)

Dear Judge Carter:

In response to defendants' *Reply* in support of their motion for summary judgment, the Court should be aware that defendants **never responded to or denied** the allegations in plaintiff's Second Amended Complaint and further inserted facts in the *Reply* that were not raised in their original moving papers. Plaintiffs, if the Court so desires, would be willing to submit a *sur-reply*.

Respectfully,

/s

Vik Pawar (VP9101)

Cc: Mr. Evan C. Brustein, Esq.
Assistant Corporation Counsel